

08 SEP 1986

CERTIFIED MAIL P# 235 350 101
RETURN RECEIPT REQUESTED

Mr. Louis G. Zachary, Sr.
Universal Die Casting, Inc.
232 Monroe Street
Saline, Michigan 48175

RE: RCRA Facility Assessment
Visual Site Inspection
MID 980 795 512

Dear Mr. Zachary:

A review of our records indicate that the Part A and the closure certification for the referenced facility are currently under review by this office and the Michigan Department of Natural Resources.

On November 8, 1984, President Reagan signed and thus enacted the Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization). The Amendments contain a number of far-reaching provisions that may impact the future operations of your facility.

We encourage you to stay abreast of developments relating to these new statutory provisions and we plan to provide further guidance to you as it becomes available. The purpose of this letter, however, is to begin implementation of one aspect of the new Amendments relative to corrective action for past or continuing releases.

All interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these.

The Solid Waste Management Unit (SWMU) response letter from your facility has not been received. This indicates the need for additional information. The RCRA facility assessment (RFA) is the first phase in the process of determining whether solid waste management units (SWMUs) are releasing hazardous constituents to the environment and require corrective action. This RCRA

facility assessment (RFA) includes both a visual site inspection (VSI) and optional sampling visits (SV) to gather additional evidence of releases by the U.S. EPA.

We plan to conduct a visual site inspection of your facility on September 17, 1986, at 10:00 AM.

Should you have further questions regarding this matter, please contact Carol Witt of my staff, at (312) 886-6146.

Sincerely,

ORIGINAL SIGNED BY/
KARL BREMER

Karl E. Bremer, Chief
Technical Programs Section

cc: Alan Howard, MDNR
Dave Slayton, MDNR
Jim Roberts, MDNR
Joe Baker, HWEB ✓

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

MID 980 795 512

PROJECT/CASE NO: _____
SUBJECT: _____
LOCATION: _____
CITY: _____ COUNTY: _____ STATE: _____
DATE: _____ TIME: _____
WEATHER: (SUN) (HAZE) (CLOUDY) (RAIN) (SNOW)
PHOTOGRAPHER (Sig.) _____
WITNESS: _____
CAMERA: _____
FILM TYPE: _____ ASA: _____ T:1/ _____ f: _____
NEGATIVE LOCATION: _____ FILE #: _____
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PHOTO #: _____ of _____

GPO 835-339

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

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GPO 838-588



OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

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GPO 838-588



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GPO 838-588



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GPO 835-33



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PROJECT/CASE NO: _____
SUBJECT: _____
LOCATION: _____
CITY: _____ COUNTY: _____ STATE: _____
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WEATHER: (SUN) (HAZE) (CLOUDY) (RAIN) (SNOW)
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GPO 835-33



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GPO 838-589



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GPO 635-539



OFFICIAL PHOTOGRAPH
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SUBJECT: _____
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CITY: _____ COUNTY: _____ STATE: _____
DATE: _____ TIME: _____
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PHOTOGRAPHER (Sig.) _____
WITNESS: _____
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FILM TYPE: _____ ASA: _____ T: 1/ _____ f: _____
NEGATIVE LOCATION: _____ FILE #: _____
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GPO 635-539

OFFICIAL PHOTOGRAPH
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GPO 635-539

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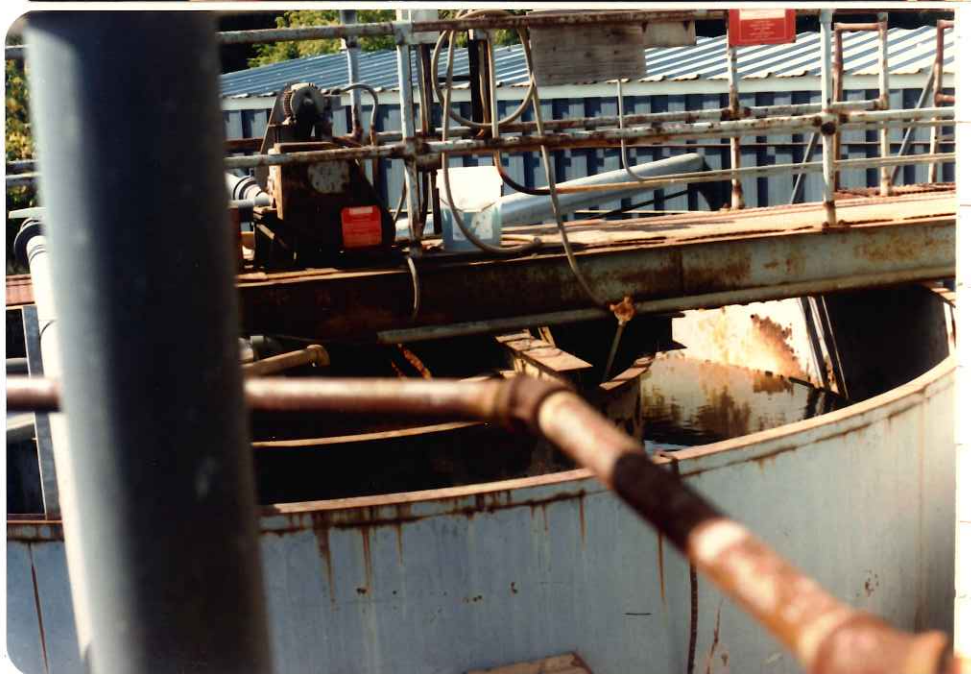
GPO 535-589



OFFICIAL PHOTOGRAPH
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GPO 535-589



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GPO 535-589



Attachment 20

Name of Preparer: STEVE BLAYER
Date: 3/6/86

Model Facility Management Plan

1. Facility Name: UNIVERSAL DIE CASTING
2. Facility I.D. Number: MTD 980 795 512
3. Owner and/or operator: DAVID E. KURDYS, PRESIDENT
4. Facility Location: 232 MONROE STREET
Street Address

SALINE WASHTENAW MI 48176
City County State Zip Code

5. Facility Telephone (if available): (313) 429-9411
6. Interim Status and/or Permitted Hazardous Waste Units and Capacities of Each Unit:

<u>Type of Units</u>	<u>Size or Capacity</u>	<u>Active or Closed</u>
<u> </u> Storage in Tanks or Containers		
<u> </u> Incinerator		
<u> </u> Landfill		
<u> X </u> Surface Impoundment (a)	TOTAL SIZE \Rightarrow 125' x 140' 66 Tons 249,000 gal/day	CLOSED
<u> </u> Waste Pile		
<u> </u> Land Treatment		
<u> </u> Injection Wells		
<u> </u> Others (Specify)		

7. Permit Application Status: ~~NO~~ PART B APPLICATION (HWDMS action item
number)
WAS CALLED IN. (1/16/84)
THEY DECIDED TO CLOSE
SURFACE IMPOUNDMENTS.

8. Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Facility: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

<u>Type of Waste</u>	<u>Quantity</u>	<u>Generated, Treated, Stored or Disposed</u> (note appropriate categories)
F006, F007 F008, F009	66 TONS/YR	Generated, TREATED

9. Review of Response to Solid Waste Management Questionnaire indicates: (check one)

☒ Solid Waste Management Units exist (other than previously identified RCRA units)

☐ No Solid Waste Management Units exist (other than previously identified RCRA units)

☐ It is unclear from review of questionnaire whether or not any solid Waste Management Units exist

☐ Respondent indicates that does not know if any Solid Waste Management Units exist

10. If the response to question 9 is that Solid Waste Management Units exist, than check one of the following:

☒ Releases of hazardous waste or constituents have occurred or are thought to have occurred

☐ Releases of hazardous waste or constituents have not occurred

☐ Releases of hazardous waste or constituents have occurred or are thought to have occurred but have been adequately remedied

☐ It is not known whether a release of hazardous waste or constituents has occurred

11. The facility is on the National Priorities List or proposed update of the List or ERRIS list ✓ Yes - indicate List or update Facility IS LISTED IN Michigan SITES OF ENVIRONMENTAL CONTAMINATION PROPOSED PRIORITY LIST (ACT 307), GROUP 2
- No
- Yes - ERRIS list

Prior to completion of the Recommendation portion of the Facility Management Plan, the attached Appendix must be completed.

12. Recommendation for Regional Approach to the Facility: Check one

- ✓ Further Investigation to Evaluate Facility
- Permit Compliance Schedule
- Corrective Action Order (may include compliance schedule)
- Other Administrative Enforcement
- Federal Judicial Enforcement
- Referral to CERCLA for Federally Financed or Enforcement Activity
- Voluntary/Negotiated Action
- State Action

Brief narrative in explanation of selection : Evaluate Facility to see if there is any contamination left after closure of surface impoundment.

- a) If further investigation alternative is selected:

- ✓ Site inspection - anticipated inspection date June 1986
- State or Federal inspection June 1986
- ✓ Preliminary Assessment - anticipated completion date August 1986
- RI/FS - anticipated date of initiation
- State/Federal
- Private Party identify party(ies)

b) If Permit Alternative is Selected: Projected Schedule

Date of Part B Submission: _____

Date of Completeness Check: _____

Date for Additional Submissions (if required): _____

Date of Completion of Technical Review: _____

Completion of Draft Permit/Permit Denial: _____

Public Notice for Permit Decision: _____

Date of Hearing (if appropriate): _____

Date for Final Permit or Denial Issuance: _____

Description of any corrective action provisions to be included in permit -

c) If Corrective Action Order Alternative is Selected:

Estimated Date for Order Issuance: _____

Description of Provisions of the Order to be Completed by Facility: _____

Description of Compliance Schedule to be Contained in Order:

d) If Other Administrative Enforcement Action is Selected:

Projected Date for Issuance of the Order: _____

Description of Provisions or Goals of the Order: _____

e) If Judicial Enforcement Alternative Selected:

Date of Referral to Office of Regional Counsel: _____

f) If Referral to CERCLA for Action Selected:

Date of Referral to CERCLA Sections: _____

g) If Voluntary/Negotiated Action Alternative if Selected:

Date of Initial Contact with Facility: _____

Description of Goals of Contact or Discussions with
Facility: _____

Date for Termination of Discussions if Not Successful:

Date of Finalization of Settlement if Negotiation Successful:

h) If State Action Alternative is Selected:

Date for Referral to State: _____

Name of State Contact: _____

Phone: _____

APPENDIX

The questions constituting this Appendix to the Facility Management Plan must be filled out prior to completion of recommendation elements of the Plan. The purpose of this appendix is to provide a summary documentation of the State and/or U.S.EPA review of available information on the subject facility. The intent is that a comprehensive file review will be conducted as the basis for selection of the recommended approach to a given facility. If the Appendix is completed by State personnel questions referring to available data reference information in State files; for Federal personnel the reference is to Federal files. Where questions refer to "all" available data or information and such material is voluminous, the response should indicate that files are voluminous, and then reference most telling information, for example groundwater contaminants found frequently or at extremely high concentrations should be specifically listed, and information most directly supporting recommended approach to facility should be described. If no information is available in facility files, the response should so indicate. It is also anticipated that this Appendix may be updated periodically as more information becomes available.

1. Description of All Available Monitoring Data for Facility:

<u>Type of Data</u>	<u>Date</u>	<u>Author</u>	<u>Summary of Results or Conclusions</u>
---------------------	-------------	---------------	--

None

2. Description of Enforcement Status:

<u>Type of Action</u>	<u>Date</u>	<u>Local, State or Federal</u>	<u>Result or Status</u>
-----------------------	-------------	--------------------------------	-------------------------

None

3. Description of Any Complaints from Public:

<u>Source of Complaint</u>	<u>Date</u>	<u>Recipient</u>	<u>Subject and Response</u>
None			

4. Description of All Inspection Reports for Facility:

<u>Date of Inspection</u>	<u>Inspector</u> (Local, State, Federal)	<u>Conclusions or Comments</u>
8/21/84	STATE	NO Violations - Ground Water Monitoring
8/27/84	STATE	RECORD REVIEW - CLOSURE Plan Violation
11/22/83	STATE	GROUND Water monitoring
9/20/83	STATE	RCRA inspection
3/31/83	STATE	RCRA inspection
9/1/82	STATE	RCRA inspection

5. During inspection of this facility did the inspector note any evidence of past disposal practices not currently regulated under RCRA such as piles of waste or rubbish, injection wells, ponds or surface impoundments that might contain waste or active or inactive landfills?

_____ Yes - give date if inspection and describe observation

☒ No

_____ Don't know

6. Do inspection reports indicate observations of discolored soils or dead vegetation that might be caused by a spill, discharge or disposal of hazardous wastes or constituents?

____ Yes - indicate date of report and describe observations

☒ No

____ Don't know

7. Do inspection reports indicate the presence of any tanks at the facility which are located below grade and could possibly leak without being noticed by visual observation?

____ Yes - date of inspection and describe information in report

☒ No

____ Don't know

8. Does a groundwater monitoring system exist at the facility? Yes

9. If answer to question 8 is yes, is the groundwater system capable of monitoring both regulated RCRA units and other Solid Waste Management Units? yes

Explain - From inspection of 8/21/84. Ground-water monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility has been implemented.

10. Is the groundwater monitoring system in compliance with applicable RCRA groundwater monitoring standards? yes

If no, explain deficiency _____

11. Describe all information on facility subsurface geology or hydrogeology available.

<u>Type of Information</u>	<u>Author</u>	<u>Date</u>	<u>Summary of Conclusions</u>
No Information - (District file search needed)			

12. Did the facility submit a 103(c) notification pursuant to CERCLA?

☐ Yes Date of Notification _____
☒ No

13. If answer to 12 is yes, briefly summarize content of that notification.
(waste management units identified, type of waste concerned)

None Submitted

14. Has a CERCLA Preliminary Assessment/Site Investigation (PA/SI) been completed for this facility?

____ Yes
☒ No

15. If answer to question 14 is yes, briefly describe conclusions of the PA/SI focusing on types of environmental contamination found, wastes and sources of contamination.

No PA/SI

16. If available, having reviewed the CERCLA notification, RCRA Part A and RCRA Part B, it appears that: (CERCLA unit refers to unit or area of concern in CERCLA response activity)

 RCRA and CERCLA units are same at this facility

 RCRA and CERCLA units are clearly different units

 There is an overlap between the RCRA and CERCLA units
(some are the same, some are different)

No CERCLA Notification

17. Description of Any Past Releases or Environmental Contamination:

<u>Type/Source of Release</u>	<u>Date</u>	<u>Material Released</u>	<u>Quantity</u>	<u>Response</u>
<u>None Reported</u>				

18. Identification of Reports or Documentation Concerning Each Release Described in Item 17.

None reported

<u>Title/Type of Report</u>	<u>Date</u>	<u>Author</u>	<u>Recipients</u>	<u>Contents</u>
-----------------------------	-------------	---------------	-------------------	-----------------

19. Highlight any information gaps in the file - describe any plans to obtain additional needed information.

None

20. Summary of major environmental problems noted, desired solution and possible approaches.

Discussed in district File search

<u>Problem</u>	<u>Solution</u>	<u>Approach</u>	<u>Pros and Cons</u>
----------------	-----------------	-----------------	----------------------

Corporate Office
825 Victors Way
P.O. Box 1003
Ann Arbor, Michigan 48106
(313) 665-1500

RECEIVED

January 27, 1986

FEB 04 1986

SWD - MID
U.S. EPA, REGION V

HOOVER
UNIVERSAL
RECEIVED

JAN 31 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

Certified Mail
Return Receipt Requested

Mr. David A. Stringham
U.S. E.P.A.
230 South Dearborn Street
Chicago, IL 60604

Attn: 4HS-13

Re: Certification Regarding Potential Releases
from Solid Waste Management Units
Universal Die Casting
Saline, MI
MID 980 795 512

Dear Mr. Stringham:

This is to inform you that the facility referenced above was sold by Hoover Universal on January 20, 1984, to Universal Die Casting, Inc. (UDC). The president is Mr. Louis G. Zachary, Sr., the mailing address is:

Universal Die Casting, Inc.
232 Monroe Street
Saline, Michigan 48176

Plant technical information is typically transmitted by Mr. Daniel Judson, plant chemist at UDC, to whom a copy of your original certification document has been forwarded.

If you have any questions regarding this transmission, please call at your convenience.

Sincerely,



Thomas M. Nolan
Staff Environmental Engineer

TMN/ml

cc: Dan Judson
Ray Jusak
L. James Smith

COPY

RECEIVED
JAN 30 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V

JAN 17 1986



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-13

JAN 10 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ray Jusak
Corporate Office
Hoover Universal, Inc.
825 Victors Way
P.O. Box 1003
Ann Arbor, MI 48106

RE: Closure Plan
Universal Die Casting
Saline, MI
MID 980 795 512

Dear Mr. Jusak

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status", while complying with applicable 40 CFR Part 265 standards.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the above-referenced facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Sincerely yours

A handwritten signature in dark ink, appearing to read "David A. Stringham". The signature is fluid and cursive, with a long horizontal stroke at the end.

David A. Stringham
Chief, Solid Waste Branch

Enclosure

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: _____
EPA I.D. NUMBER: _____
LOCATION CITY: _____
STATE: _____

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	<u>YES</u>	<u>NO</u>
◦ Landfill	_____	_____
◦ Surface Impoundment	_____	_____
◦ Land Farm	_____	_____
◦ Waste Pile	_____	_____
◦ Incinerator	_____	_____
◦ Storage Tank (Above Ground)	_____	_____
◦ Storage Tank (Underground)	_____	_____
◦ Container Storage Area	_____	_____
◦ Injection Wells	_____	_____
◦ Wastewater Treatment Units	_____	_____
◦ Transfer Stations	_____	_____
◦ Waste Recycling Operations	_____	_____
◦ Waste Treatment, Detoxification	_____	_____
◦ Other _____	_____	_____

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Typed Name and Title

Signature

Date

CONTINUING RELEASES AT PERMITTED FACILITIES

SEC. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof:

"(u) CONTINUING RELEASES AT PERMITTED FACILITIES.—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."